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August 2, 2013

Thomas J. Grever

BY ELECTRONIC MAIL

Ms. Jacqueline Clark  
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U.S. Environmental Protection Agency  
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BY FEDERAL EXPRESS

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604

***Re: Clean Air Act Section 114 Request for Information to Wedron Silica Company and Technisand, Inc.***

Dear Ms. Clark:

On behalf of Wedron Silica Company and Technisand, Inc. (collectively "the Companies"), we hereby respond to Request Nos. 1, 2, and 4 of the United States Environmental Protection Agency's Request to Provide Information Pursuant to the Clean Air Act dated June 28, 2013 ("Information Request"). The Companies received the Information Request on July 3, 2013.

EPA has agreed to an extension of time, until August 19, 2013, for the Companies to provide responses to Request Nos. 3, 5, and 6 of the Information Request. Additionally, by agreement, responses to Request Nos. 7 through 22 are deferred pending discussions between EPA and the Companies. As agreed by EPA, the Companies will submit a PM10 ambient air monitoring plan for EPA review and approval on or by August 26, 2013. The Companies will also submit a preliminary outline of their monitoring plan, including their recommendations regarding potential PM10 monitoring and their support for monitor siting consistent with EPA guidelines on monitor siting, as set forth in 40 C.F.R. Part 58, Appendices A and E, by August 9, 2013.

As a general matter, the Companies object to the Information Request to the extent it is vague, overly broad, unduly burdensome, and outside the scope of EPA's authority under

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Section 114 of the Clean Air Act. The Companies also object to the Information Request to the extent it would require creation of documents not already in existence. The Companies believe that certain requests may be objectionable on the grounds that they exceed EPA's authority by seeking information not directly related to their compliance with the regulations, or by incorporating or requesting legal conclusions to which they may object. However, in an effort to cooperate, and without waiving these objections, the Companies are providing responses to certain requests. The Companies have attempted to respond fully to each request, but reserve all of their objections to any particular request or any future use of information and documents submitted in response to the Information Request.

The Companies further reserve the right to supplement or amend any responses based on additional information found after this submittal. Nothing about these responses is intended to, nor should be construed to, constitute the Companies' agreement with any legal conclusion contained in or underlying any specific request, or that the information requested is relevant to any aspect of the Companies' compliance with applicable laws or regulations.

Please direct any questions regarding the Information Request to me, at (816) 559-2375 or [tgrever@shb.com](mailto:tgrever@shb.com).

Sincerely,



Thomas J. Grever

TJG:lm  
Enclosure

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**Wedron Silica Company and Technisand, Inc.'s  
Response to EPA's June 28, 2013  
Request for Information  
Pursuant to Section 114 of the Clean Air Act  
Questions 1, 2 and 4**

**1. Within 30 days of receipt of this request, identify any and all air monitoring that has been or is being conducted by or on behalf of the Companies, including any affiliated or hired contractor(s), the Companies' Facility in Wedron, Illinois, from the date of construction of the Facility to the present. Include the name and address of the Facility, latitude and longitude of monitor location(s), a map showing the locations of the property lines of the Facility and location(s) of the monitoring station(s), name of any contractors used for data collection and/or data analysis, date(s) of monitoring, the methodology used, instrumentation (monitor type, size fraction), duration, and data reviews and/or reports produced.**

**Response:**

No ambient air monitoring has been conducted by or on behalf of the Companies at the Companies' Facility in Wedron, Illinois, since the Facility's construction.

**Persons Consulted in Preparation of This Response:**

Michael Melton  
Corporate Environmental Manager  
Fairmount Minerals, Ltd.

Mark Schiefelbein  
Environmental Coordinator  
Fairmount Minerals, Ltd.

**2. Within 30 days of receipt of this request, the Companies must submit any and all air monitoring that has been or is being conducted by or on behalf of the Companies, including any affiliated or hired contractor(s), at, near, or around its Wedron, Illinois Facility since the date of construction of the Facility to the present, for particulate matter (PM) under 10  $\mu\text{m}$  ( $\text{PM}_{10}$ ), PM under 4  $\mu\text{m}$  ( $\text{PM}_4$ ), PM under 2.5  $\mu\text{m}$  ( $\text{PM}_{2.5}$ ), or Total Suspended Particulate (TSP), including, but not limited to, meteorological data (wind speed, wind direction). Include the name of any contractors used for data collection and/or data analysis, methodology used, instrumentation (monitor type, size fraction), duration, raw data, and data reviews and/or reports produced.**

**Response:**

No ambient air monitoring has been conducted by or on behalf of the Companies at or near the Companies' Facility in Wedron, Illinois, since the Facility's construction.

**Persons Consulted in Preparation of This Response:**

Michael Melton  
Corporate Environmental Manager  
Fairmount Minerals, Ltd.

Mark Schiefelbein  
Environmental Coordinator  
Fairmount Minerals, Ltd.

4. Within 30 days of receipt of this request, provide the dates (day, month, and year) on which each of the dryers at the Facility was constructed and the dates on which it commenced operation.

**Response:**

Rotary Dryer No. 1: Illinois EPA issued a construction permit for this dryer on March 6, 1990. Facility records indicate that the dryer was "initially turned over toward the end of May, 1990." Due to design issues, construction of the dryer was not completed until approximately July 1991. Following stack testing that was completed on December 11, 1991, Illinois EPA issued an operating permit for the dryer on March 2, 1992.

Rotary Dryer No. 2: Construction commenced on December 1, 2006, and start-up occurred on June 5, 2007.

Rotary Dryer No. 3: Construction commenced on June 15, 2012, and start-up occurred on May 1, 2013.

Facility records indicate that ten steam-heated dryers were previously used at the Facility but all such dryers were taken out of service between 1982 and 1995.

**Persons Consulted in Preparation of This Response:**

David Olchawa  
Central Region Environmental Manager  
Fairmount Minerals, Ltd.

Mark Schiefelbein  
Environmental Coordinator  
Fairmount Minerals, Ltd.